

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

ARISTA RECORDS LLC, ATLANTIC
RECORDING CORPORATION, CAPITOL
RECORDS, LLC, ELEKTRA ENTERTAINMENT
GROUP INC., LAFACE RECORDS LLC, SONY
MUSIC ENTERTAINMENT, UMG
RECORDINGS, INC., WARNER BROS.
RECORDS INC., WARNER MUSIC GROUP
CORP., and ZOMBA RECORDING LLC,

Plaintiffs,

v.

VITA TKACH, and DOES 1-10, D/B/A
GROOVESHARK.IO AND GROOVSHARK.PW

Defendants.

CIVIL ACTION
NO. 15-CV-03701-AJN

NOTICE OF MOTION

PLEASE TAKE NOTICE that the undersigned attorneys for Non-Party CloudFlare, Inc. (“CloudFlare”) hereby move this Court, before the Honorable Alison J. Nathan, United States District Judge for the Southern District of New York at the Thurgood Marshall United States Courthouse located at 40 Foley Square, Courtroom 906, New York, New York 10007 at a time set by this Court, for an Order granting Plaintiffs’ Motion to Modify the Preliminary Injunction under Federal Rule of Civil Procedure 65(a), and for such other and further relief as the Court deems appropriate.

PLEASE TAKE FURTHER NOTICE that in support of this motion, Plaintiffs shall rely upon this Notice of Motion; the accompanying Memorandum of Law; the accompanying

declaration of David Koston; and upon all other prior papers and proceedings heretofore had herein.

DATED: June 17, 2015

Respectfully submitted,

/s/ Grant P. Fondo_____

William J. Harrington (WH-6376)
Grant Fondo (admitted *pro hac vice*)
GOODWIN PROCTER LLC

Mitchell L. Stoltz (admitted *pro hac vice*)
Corynne McSherry(admitted *pro hac vice*)
ELECTRONIC FRONTIER FOUNDATION

Attorneys for Non-Party CloudFlare, Inc.

CERTIFICATE OF SERVICE

I hereby certify that this document filed through the CM/ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants.

/s/ Grant P. Fondo